APPENDIX A

NSWPorts

Supplier Code of Conduct

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Introduction and Purpose

This Supplier Code of Conduct ("Code") outlines the minimum ethical standards and behaviour that NSW Ports expects from all its Suppliers in ensuring business is conducted responsibly and sustainably. **In this Code, "Supplier" means a person or entity that has entered, or intends to enter an agreement for the supply to NSW Ports of goods or services** .

Suppliers must read this Code and should ensure that their operations and supply chain perform to support NSW Ports' vision to sustainably manage and deliver essential trade infrastructure for the economy and community.

We are committed to driving sustainable growth that delivers long-term value for our shareholders, makes a positive contribution to the community, and protects the environment. This Code reflects this commitment by setting clear expectations for ethical, responsible, and sustainable business practices across our supply chain.

The Code is informed by key strategic plans and objectives set out in NSW Ports' 2063 Master Plan and Sustainability Strategy available on our website. It is also aligned and supported by our Sustainability Policy that guides our approach on environmental, social and governance aspects that are instrumental to our business and its sustainable growth.

Suppliers should communicate this Code to their sub-contractors who perform services for the benefit of NSW Ports.

Legal and Regulatory Compliance

All Suppliers must comply with all applicable laws and regulations in the countries where they operate.

Environment

Suppliers are expected to strive to improve their environmental performance by implementing and maintaining systems to effectively identify and mitigate environmental risks in their own operations and relevant communities or surroundings. All Suppliers must adhere to any applicable Environmental Management Plans and Conditions of Approvals, including incident reporting. In some instances, Suppliers will be required to prepared Construction or Operational Environmental Management Plans to manage their environmental risk.

Energy, natural resources and materials

Suppliers should minimise the impact of their operations, products or services by proactively managing and reducing the energy, natural resources and materials they use, emphasising repairability, and ensuring responsible end-of-life management. Suppliers are also encouraged to adopt a circular economy principle of the "5 Rs": Refuse, Reduce, Reuse, Repurpose, Recycle.

NSW Ports encourages Suppliers to protect the water quality of waterways around their operations and to reduce the consumption of operational potable water.

NSW Ports encourages Suppliers to set plans of Greenhouse Gas emissions reduction in line with the Paris Agreement, including both operational and embodied carbon emissions.

Pollution and Waste

Suppliers should limit waste and all types of pollution (including air, water, noise, and soil) in their operations, products and services. They should also manage wastewater responsibly and prioritise non-hazardous materials in products and processes. When hazardous substances are unavoidable, Suppliers must ensure compliant classification, labelling, and safe handling protocols.

Nature & Biodiversity

Suppliers shall identify any ecological habitat where protected species are present, or likely to be present, where work is being performed or nearby, and manage works to minimise their impacts on the habitats.

Social

Suppliers are expected to maintain socially responsible employment practices, ensuring a healthy, safe work environment, free of any human right abuses.

Health and Safety

Suppliers shall provide a healthy and safe workplace to prevent workplace incidents and injuries (both physical and mental health issues) arising from or occurring during work, or as a result of their operations.

Suppliers shall also ensure that all of their employees are clearly informed of any inherent workplace hazards and are equipped with appropriate knowledge, training, and personal protective equipment to mitigate these risks. In addition, Suppliers are expected to implement effective hazard management processes to identify, assess and control potential dangers in the work environment.

Suppliers shall have zero-tolerance for physical, sexual, verbal or psychological abuse, any form of harassment, hate speech, intimidation, bullying, violence and corporal punishment, and ensure that disciplinary measures do not include physical or mental punishment.

Diversity, Equality and Inclusion

Suppliers shall prohibit unlawful discrimination in employment, hiring, training, personal and career development, compensation, or termination of employment. Suppliers should also provide equal opportunity and fair treatment to all employees, ensuring employment and promotion decisions are based on merit and free from any kind of discrimination.

Labour and Human Rights

NSW Ports fully supports the aims of the *Modern Slavery Act 2018.* Respect for human rights is fundamental to our values, long-term sustainability, the growth of our business and to the wellbeing of the communities in which we operate.

NSW Ports does not permit any forms of modern slavery in its procurement supply chains, including but not limited to:

- Forced labour: Suppliers must ensure that employees are free to terminate their employment at any time after giving lawful notice.
- Child labour: Suppliers must not employ children under the legal age of employment in the relevant jurisdiction.
- Unreasonable pay and working hours: Suppliers must provide their employees with wages paid on-time, fully, and regularly, as well as overtime pay, benefits, and paid leave. Suppliers must ensure that the maximum regular working hours and maximum overtime hours of all employees shall not be over the threshold stated in relevant legislations. .
- Any other forms of modern slavery, such as servitude, debt bondage, human trafficking, and deceptive recruitment.

NSW Ports takes a zero-tolerance approach to modern slavery where a Supplier fails to take action to address an identified case. Suppliers are encouraged to raise any concerns regarding modern slavery with their contract manager or contact at NSW Ports.

Governance

Suppliers are expected to always act in an ethical, responsible and transparent manner.

Quality

Suppliers must ensure that all goods and services provided meet agreed contract requirements and comply with applicable Australian laws.

Business Ethics and Anti-Bribery

Suppliers must not offer, pay or accept bribes, facilitation payments, kickbacks, secret or inflated commissions, or any other improper benefits. Suppliers should uphold high standards of ethical behaviour and professional integrity.

Suppliers are expected to identify, declare, and effectively manage all actual, potential, or perceived conflicts of interest with NSW Ports' employees. A conflict of interest arises when personal, financial, or other interests could improperly influence or be seen to influence decision-making. Suppliers should disclose to NSW Ports any conflicts at the earliest opportunity.

Grievance Mechanisms

Suppliers should maintain transparent processes to allow violations, misconduct, or grievances to be confidentially reported by employees, communities, and other stakeholders, and addressed without fear of retaliation.

Information Protection

Information provided by or collected from NSW Ports is provided to Suppliers on a confidential basis, unless otherwise explicitly indicated in their contract. Suppliers should also implement appropriate cybersecurity measures to protect data, systems, and networks from unauthorised access, breaches, and disruption.

Responsible Sourcing

NSW Ports encourages all Suppliers to practice responsible sourcing by promoting responsible business standards within their supply chains. Specifically, Suppliers are expected to:

- Encourage their suppliers to identify potential environmental, social, and governance risks, including those associated with their subcontractors and upstream material providers.
- Take proactive steps to address sustainability risks throughout their supply chain, not just within direct operations.
- Place specific emphasis on identifying and mitigating modern slavery risks at all tiers, particularly for Suppliers operating in industries with potentially higher risk exposures.
- Engage in ongoing due diligence and transparent reporting to improve supply chain accountability and traceability.

Compliance with the Code

- Suppliers are encouraged to adopt a continuous improvement approach to areas covered in this Code.
- The compliance with this Code will be considered in NSW Ports procurement decisions. Suppliers are encouraged to discuss any concerns of this Code with their contract manager or contact at NSW Ports.
- NSW Ports may at times request information from Suppliers to assess their alignment with this Code.

Version Control

VERSION	DATE	AUTHOR	NATURE OF AMENDMENT
1.0	June 2025	Sarah Braude Sustainability Manager	Created

Approval

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1.0	June 2025		Approved

Further information

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